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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CR 14-527 RS
)	
v.)	
)	STIPULATION AND PROPOSED ORDER FOR
ALLEN FONG,)	A CONTINUANCE AND EXCLUSION OF TIME
YA HUAI HUNG,)	UNDER THE SPEEDY TRIAL ACT, 18 U.S.C.
JIE MU,)	§ 3161 ET. SEQ
LAURENCE SHU KWAN LEE,)	
KEVIN HARTIG,)	
WAYLEN FONG,)	
ANGELINA CHUONG, and)	
CHONTHICHA JAEMRATANASOPHIN,)	
)	
Defendants.)	

The United States of America, by and through its attorney of record, and the above-captioned defendants ("defendants"), by and through their respective attorneys of record, hereby stipulate as follows:

1. For the reasons stated in open court on May 24, 2016, the Court continued the above-captioned matters to July 26, 2016 at 2:30 p.m. and excluded time under the Speedy Trial Act from May

24, 2016 through July 26, 2016 based upon effective preparation of counsel under 18 U.S.C. §§3161(h)(7)(A) and (B)(iv).

2. The parties stipulate and agree that this matter should be continued to July 26, 2016 at 2:30 p.m., and that the failure to grant such a continuance would unreasonably deny the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. The parties further stipulate and agree that the time from May 24, 2016 through July 26, 2016 should be excluded based upon the complexity of the case in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(ii), and on the basis that the ends of justice are served by taking such action which outweigh the best interest of the public and the defendants in a speedy trial and for effective preparation of counsel, taking into account the exercise of due diligence, under 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: May 25, 2016

Respectfully submitted,

BRIAN J. STRETCH
United States Attorney

/s/

DEBORAH R. DOUGLAS
Assistant United States Attorney

/s/

GALIA AMRAM, Esq.
Attorney for Defendant Allen Fong

/s/

ROBERT WAGGENER & RICHARD
HULLINGER, Esqs.
Attorney for Defendant Ya Huai Hung

/s/

MARK GOLDROSEN, Esq.
Attorney for Defendant Jie Mu

/s/

ALAN DRESSLER, Esq.
Attorney for Defendant Laurence Shu
Kwan Lee

/s/

SETH CHAZIN, Esq.
Attorney for Defendant Kevin Hartig

/s/

GILBERT EISENBERG, Esq.
Attorney for Defendant Wavlen Fong

/s/

ALEXANDRA McCLURE, Esq.
Attorney for Defendant Angelina Chuong

/s/

SCOTT SUGARMAN, Esq.
Attorney for Defendant Chonthicha
Jaemratanasophon

ORDER

Upon the parties' stipulation, and GOOD CAUSE appearing, IT IS HEREBY ORDERED that the above-captioned matters shall be continued to July 26, 2016 at 2:30 p.m. and that the time from May 24, 2016 through July 26, 2016 shall be excluded in accordance with the provisions of the Speedy Trial Act, 18 U.S.C. §§ 3161(h)(7)(B)(ii), and 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv). The Court finds that (A) the above-captioned matters are complex based upon the nature of the prosecution; (B) failure to grant the continuance would unreasonably deny the defendants the reasonable time necessary for effective preparation, taking into account the exercise of due diligence; and (C) the ends of justice served by the continuance outweigh the best interests of the public and the defendants in a speedy trial.

IT IS SO ORDERED.

DATED: May 25, 2016



HONORABLE RICHARD STENBERG
UNITED STATES DISTRICT JUDGE